

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

RICK ULSH, PATTI DELVALLE, and
HAROLD SHEFFER, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

FARM JOURNAL, INC., D/B/A FARM
JOURNAL MEDIA,

Defendant.

Case No. 21-cv-11811
Hon. David M. Lawson
Magistrate Judge Anthony P. Patti

**STIPULATION TO EXTEND PLAINTIFFS' DEADLINE TO RESPOND TO
DEFENDANT'S MOTION TO DISMISS (ECF No. 39)**

WHEREAS, on June 10, 2022, Plaintiffs Ulsh, Del Valle, and Scheffer (“Plaintiffs”) filed the operative First Amended Complaint (“FAC”) in this action with Defendant’s written consent pursuant to Fed. R. Civ. P. 15(a)(2) (ECF No. 32);

WHEREAS, on August 16, 2022, Defendant filed a Motion to Dismiss the operative FAC (ECF No. 39);

WHEREAS, Plaintiff’s response in opposition to Defendant’s Motion to Dismiss (ECF No. 39) is currently due on September 6, 2022;

WHEREAS, the Parties are engaged in settlement discussions and are optimistic that they will reach a resolution of this matter;

WHEREAS, the Parties believe that judicial economy will be served by extending Plaintiffs' deadline to respond to the Motion to Dismiss (ECF No. 39) to allow the Parties to focus on settlement efforts;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for Plaintiffs and Defendant as follows:

1. Plaintiffs' deadline to file their Response in Opposition to Defendant's Motion to Dismiss Plaintiffs' FAC is extended by 14 days, from September 6, 2022 to September 20, 2022.¹

Dated: September 1, 2022

THE MILLER LAW FIRM, P.C.

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Attorneys for Defendant

¹ A Proposed Order to this effect has been contemporaneously submitted via Utilities and then distributed among all Counsel herein.

CERTIFICATE OF SERVICE

I certify that on September 1, 2022, I caused the foregoing document to be filed with the Clerk of the Court via the CM/ECF system (as well as filed the referenced Proposed Order via utilities and sent to all counsel of record), which will cause notice of same to be sent to all counsel of record.

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